

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CAROLYN GREENE, on behalf herself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 03-CV-12628

JOHN G. ESPOSITO, JR., D.D.S., on  
behalf himself and all others similarly  
situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10013

JOSEPH L. KING, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10038

[Additional Captions Follow on Next Page]

Michael E. CRIDEN, on behalf himself  
and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10046

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

ISRAEL SHURKIN and SHARON  
SHURKIN on behalf themselves and all  
others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10055

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

JAMES J. NIZZO and VIRGINIA C.  
NIZZO, as JOINT TENANTS and CARLO  
CILIBERTI, on behalf of themselves and  
all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10065

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

[Additional Captions Follow on Next Page]

BARRY BROOKS, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10077

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

ANASTASIOS PERLEGIS, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10078

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

MARTIN WEBER, on behalf of himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10090

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

[Additional Captions Follow on Next Page]

BRUCE HAIMS, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-10144

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

MODEL PARTNERS LIMITED, on behalf themselves and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10155

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

JUNE E. PATENAUME, on behalf of herself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10179

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

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NANCY L. PINCKNEY and GERTRUDE PINCKNEY, on behalf themselves and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10189

W. KENNETH JOHNSON, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10190

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

GREGORY KRUSZKA, on behalf of himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10202

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,  
Defendants.

**GEORGE ELIOPoulos, DALE SELF AND MARK MENTZ'S MOTION FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS,  
AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

George Eliopoulos, Dale Self and Mark Mentz, by their counsel, hereby respectfully move this Court to: (i) consolidate all related actions; (ii) be appointed Lead Plaintiffs in the consolidated securities class action; and (iii) approve its selection and retention of Berman DeValerio Pease Tabacco Burt & Pucillo (“Berman DeValerio”) and Cohen, Milstein, Hausfeld & Toll, P.L.L.C. as Lead Counsel.

In support of this Motion, Plaintiffs submit herewith a Memorandum of Law, the Declaration of Jeffrey C. Block, Esq., and a Proposed Order.

Dated: March 1, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE  
TABACCO BURT & PUCILLO**

/s/ Jeffrey C. Block

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**COHEN, MILSTEIN, HAUSFELD &  
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**Attorneys for Plaintiffs George  
Eliopoulos, Dale Self and Mark Mentz**

**Proposed Lead Counsel**